

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

**In Re: Valsartan NDMA Products  
Liability Litigation**  
MICHAEL SHEMES,

Plaintiff,

v.

AUROBINDO PHARM, LTD.; AUROLIFE  
PHARMA, LLC; ACTAVIS, LLC; ACTAVIS  
PHARMA, INC.; AUROBINDO PHARMA  
USA, INC.; CVS HEALTH.; HUMANA  
PHARMAY, INC.; JOHN DOE; CVS  
PHARMACY, INC.; ZHEJIANG HUAHAI  
PHARMACEUTICAL CO., LTD.; SANDOZ,  
INC.,

Defendants.

Master Docket No. 1:19-md-2875  
Honorable Robert B. Kugler  
Magistrate Judge Joel Schneider

**MOTION FOR  
SUBSTITUTION OF PARTY**

MDL No. 2875

The named Plaintiff in this action, Michael Shemes, died on July 30, 2022. *See* Certificate of Death, Exhibit A. On September 23, 2022, Dolores A. Shemes, Mr. Shemes' widow, was appointed Special Administrator of the Estate of Michael Shemes. *See* Letters of Special Administration, Exhibit B. Pursuant to Fed. R. Civ. P. 25(a)(1), Plaintiff respectfully moves that Dolores Shemes be substituted as the proper party in this action pursuant to her status as the Special Administrator of the Estate of Michael Shemes.

Dated: Wednesday, March 8, 2023

Respectfully submitted,

**/S/ MARK T. SADAKA**

---

Mark T. Sadaka, Esq., MSPH  
SADAKA ASSOCIATES LLC  
155 North Dean Street, 4th Floor  
Englewood, NJ 07631  
Telephone: (201) 266-5670  
Fax: (201) 266-5671  
Email: mark@sadakafirm.com

**CERTIFICATE OF SERVICE**

I hereby certify that on this 8th day of March, 2023, I electronically filed the foregoing with the clerk of the court by using the CM/ECF system, which will send notice to all Defendants of record.

Dated: Wednesday, March 8, 2023

**/S/ MARK T. SADAKA**  
Mark T. Sadaka, Esq., MSPH